I am forwarding to you today my comments relating to the consideration of regulations involving biomass fueled electric power facilities in Massachusetts. At the public hearing recently held in Boston, it was clear that the Commonwealth intended to rely on the Manomet Study for technical support. My comments are divided into two categories. The first relates to issues relating to the Manomet Study while the second relates to policy suggestions that would enhance the effectiveness of regulation that the Commonwealth might consider in enacting.

MANOMET STUDY: The Manomet Study seems to imply that privately operated forest land in Massachusetts is defectively managed by their owners. I do not know what evidence exists for this assertion nor do I understand why regulation of privately owned forest land is necessary particularly because the Commonwealth already regulates the use of forest land.

My principal criticism of the Manomet Study relates to the assumption that wood fired electric power plants employ whole logs for the production of electricity. All of our activities employ slash and tops which would otherwise be left in the forest to decompose and liberate CO2. We do not employ any whole logs. If the Commonwealth objects to the use of whole logs then it should ban their use unless these logs are derived from various maintenance activities or appropriate forest practices. The Commonwealth should do nothing to interfere with the use of green waste wood if it is interested in controlling CO2.

Before relying solely on the scientific content of the Manomet Study the Commonwealth should have the study reviewed by qualified independent scientists and engineers to be sure that the assumptions employed are correct and that the conclusions are valid.

POLICY CONSIDERATIONS: If the Commonwealth intends to create regulations for biomass electricity production then it should equally create incentives for enhancing energy efficiency. Our company integrates greenhouses with power plants which employ the waste heat and CO2 to dramatically improve thermal efficiency with concomitant environmental benefits. Other joint activity should also be encouraged. The average wood fired plant without the use of waste heat employs 28% of the thermal output to produce electricity. Incentives should be given to facilities which employ more than 35% of the thermal input collectively including the joint use of waste heat as this will result in a reduction in CO2.

Our company currently employs a number of engineers here in Massachusetts and expects to increase its technical staff to almost 200 people over the next three years. Our company is prepared to build an operating facility which would employ between 200 and 400 people if incentives remain for the use of biomass.

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